

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Oral Argument Requested

**NOTICE OF DEFENDANTS' JOINT MOTION TO EXCLUDE
THE OPINIONS OF STEPHEN HECHT, PH.D.**

PLEASE TAKE NOTICE that on January 18, 2022, or as soon as counsel may be heard, the undersigned Defense Executive Committee counsel, on behalf of all Defendants named in the operative Master Personal Injury Complaint (Dkt. [122](#)), the operative Consolidated Second Amended Economic Loss Class Action Complaint (Dkt. [398](#)), and the operative Consolidated Amended Medical Monitoring Class Action Complaint (Dkt. [123](#)) shall move for the entry of an Order excluding the opinions of Plaintiffs' expert, Stephen Hecht, Ph.D., pursuant to Federal Rules of Evidence 702, 403, and 104.

PLEASE TAKE FURTHER NOTICE that in support of its motion, the undersigned defendants shall rely upon the Memorandum of Law in Support submitted herewith, and any reply submissions made hereafter; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: November 1, 2021

By: /s/ Seth A. Goldberg

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 1, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Seth A. Goldberg
Seth A. Goldberg